



## MEMO ENDORSED

U.S. Department of Justice

*United States Attorney  
Southern District of New York**The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 18, 2022

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**BY ECF**

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ofer Abarbanel, 21 Cr. 532 (LAK)***

Dear Judge Kaplan:

The parties jointly request an eight-week extension of the existing pretrial motions schedule and the next pretrial conference. As the Court is aware, the discovery in this case is voluminous and the matter is complex. The parties therefore respectfully submit that the requested adjournment of the applicable deadlines is reasonable and will give defense counsel necessary time to continue reviewing the voluminous discovery and considering what motions the defense may bring.

Furthermore, the parties continue to engage in productive conversations about a potential disposition. The requested extension will allow time for these conversations to continue.

Finally, the parties jointly request that time under the Speedy Trial Act be excluded through the new date of the next pretrial conference. This exclusion is in the interest of justice as it allows the defense to continue reviewing discovery and considering the motions it may bring, and allows the parties to continue discussions about a pretrial disposition.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Allison Nichols / Christopher Clore  
Assistant United States Attorney  
Southern District of New York  
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Cc: Glen McGorty, Esq.,  
Counsel to Ofer Abarbanel (by ECF)

Memorandum Endorsement

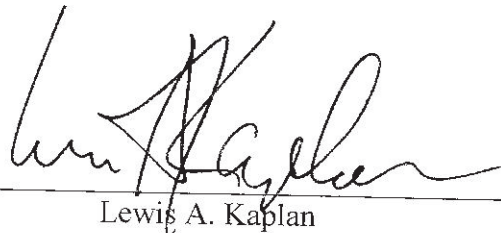
United States v Abarbanel, 21-cr-0532 (LAK)

The application is granted. An defense motions shall be filed no later than March 2, 2022. The government's response shall be filed no later than April 4, 2022. The defendant's reply, if any, shall be filed no later than April 12, 2022. The Court will hear argument and/or hold a status conference on April 20, 2022 at 10:00 a.m.

Time is excluded under the Speedy Trial Act to and including April 20, 2022. The interests of justice served thereby outweigh the interests of the public and the defendant in a speedy trial because the exclusion will permit the defendant to have a full opportunity to review voluminous discovery, determine any motions to be made and to prepare them, and to continue discussions with a view toward a possible disposition of the case.

SO ORDERED.

Dated: January 19, 2022

A handwritten signature in black ink, appearing to read 'Lewis A. Kaplan', is written over a horizontal line.

Lewis A. Kaplan  
United States District Judge